

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	19-cr-10063-DJC
RANDALL CRATER,	)	
	)	
Defendant	)	

ASSENTED-TO MOTION TO CONTINUE DEFENDANT'S SENTENCING DATE

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Defendant Randall Crater, by and through undersigned counsel, hereby moves this Honorable Court to continue his sentencing date, currently scheduled for October 27, 2022, to a date in last week of November 2022.

In support of this motion, defendant states, by and through undersigned counsel, that undersigned counsel is scheduled to begin a 4-week trial before the Honorable Douglas P. Woodlock on September 28, 2022, in the matter of United States v. Dana Pullman and Anne M. Lynch, Docket No.: 19-cr-10345-DPW. This trial was originally scheduled to begin on September 12, 2022. However, due to circumstances beyond the parties' control, the trial could not commence until September 28, 2022.

Moreover, the trial schedule established by Judge Woodlock anticipates that the trial will not go to the jury until the week of October 31, 2022. As a result of this trial schedule, undersigned counsel will not have adequate time to prepare the sentencing memorandum and associated materials for defendant's sentencing.

Finally, undersigned counsel has conferred with counsel for the government, Assistant U.S. Attorney Christopher J. Markham, regarding this request and the government assents to a continuance of the current sentencing date.

WHEREFORE, defendant respectfully requests that this Honorable Court continue his sentencing to a date in the last week of November 2022.

Respectfully submitted,  
For the Defendant,  
Randall Crater  
By his attorneys:

/s/ Scott P. Lopez  
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Dated: September 23, 2022

CERTIFICATE PURSUANT TO LOCAL RULE 7.1

The undersigned counsel for Randall Crater hereby certifies that he conferred with AUSA Christopher J. Markham on September 23, 2022, by electronic mail, in a good faith attempt to resolve or narrow the issue raised in this motion and the government assents to this motion.

/s/ Scott P. Lopez  
Scott P. Lopez

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on September 23, 2022.

/s/ Scott P. Lopez  
Scott P. Lopez

**Certificate of Service**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

By: /s/ Christopher J. Markham  
CHRISTOPHER J. MARKHAM  
Assistant U.S. Attorney